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United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.

VICTOR MANUEL ALVAREZ,  
  
Defendants.

CASE NO. 1:25-CR-00054-KES-BAM

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
AND ORDER

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through her counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for a status conference on October 8, 2025.
2. By this stipulation, defendant now moves to continue the status conference to December 10, 2025, and to exclude time between October 8, 2025, and December 10, 2025, pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv).
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The government provided initial discovery to the defense. The discovery generally consisted of law enforcement reports, photos, and undercover reports and recordings.
  - b) Defense counsel is continuing to review the discovery and investigate the case.

Defense counsel requests additional time to conduct his own independent investigation.

c) The parties require additional time to engage in plea negotiations.

d) The defendant asks the Court to exclude time between October 8, 2025, and December 10, 2025, to account for time to discuss the plea with the Government and defendant, to conduct his own investigation, taking into account the exercise of due diligence.

e) The government does not object to the continuance.

f) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendants in a trial within the original date prescribed by the Speedy Trial Act.

g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of October 8, 2025 to December 10, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv), because it results from a continuance granted by the Court at defendants' request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: October 1, 2025

ERIC GRANT  
Acting United States Attorney

/s/ ARIN C. HEINZ  
ARIN C. HEINZ  
Assistant United States Attorney

Dated: October 1, 2025

/s/ DAVID TORRES  
DAVID TORRES  
Counsel for Defendant

**ORDER**

IT IS SO ORDERED that the status conference is continued from October 8, 2025, to **December 10, 2025 at 1:00 p.m. in Courtroom 8 before Magistrate Judge Barbara A. McAuliffe**. Time is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv).

IT IS SO ORDERED.

Dated: **October 1, 2025**

/s/ *Barbara A. McAuliffe*  
UNITED STATES MAGISTRATE JUDGE